

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
EASTERN DIVISION**

**CORBEY JONES AND
CYNTHIA JONES**

Plaintiffs,

VERSUS

**JONES COUNTY, MS, ET AL.
Defendants.**

* **CIVIL ACTION NUMBER:**
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* **2:22-CV-93-KS-MTP**
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**UNOPPOSED MOTION TO EXTEND DEADLINES FOR DESIGNATION OF
EXPERTS**

NOW COMES the Plaintiff, Corbey Jones, through undersigned counsel, and files this Unopposed Motion to Extend the Deadlines for Designation of Experts.¹ As discussed below, the parties request a mutual extension of thirty (30) days for the designation of experts and exchange of expert reports. This can be done without postponing other deadlines in the case. In support of this Motion, the Plaintiff states as follows:

1.

The Plaintiff filed the Complaint in this matter on July 14, 2022.

2.

On November 15, 2022, the Magistrate Judge held a Rule 16 conference with the parties. Various issues were discussed, including scheduling.

3.

On November 15, 2022, the Court issued a Case Management Order containing several deadlines for this case. ECF Doc. 26. Amongst other deadlines, the CMO provides that the

¹ Plaintiff Cynthia Jones is now deceased.

Plaintiff will designate experts by March 1, 2023, and the Defendants will designate experts by April 3, 2023. Additionally, the CMO provides that discovery will close on June 1, 2023, and any *Daubert* motions regarding experts will be filed by June 15, 2023.

4.

The parties have engaged in written and document discovery since the Rule 16 conference, and that process continues in an amicable manner. However, because of the number of counsel involved in the case, and the busy schedules of all counsel, depositions have not yet been scheduled and additional discovery remains to be done.

5.

In light of the ongoing discovery process, the Plaintiff suggested to Defendants that a mutual extension of thirty (30) days for the deadlines to designate experts would be appropriate. The Defendants agreed to this proposal. Holding depositions and conducting additional discovery will be extremely helpful in preparing expert disclosures that thoroughly address the relevant issues. Even with a 30-day extension of the expert deadlines, the parties can work together to maintain and meet the existing discovery deadline, *Daubert* deadline, and other deadlines so that this case can move forward in a timely manner.

6.

Accordingly, the Plaintiff requests that the CMO be amended to provide that Plaintiff's experts will be designated by April 3, 2023 (because the 1st is a weekend), and the Defendants' experts will be designated by May 3, 2023.

7.

The Plaintiff submits that the requested extension of these deadlines will not adversely affect the progress of this case or upset any other deadlines set by the Court.

Wherefore, the Plaintiff respectfully requests that the Court grant this Motion and extend the deadlines for designation of experts as described herein.

Respectfully submitted,

/s/ Robert McDuff

Robert McDuff.

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Admitted Pro Hac Vice

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing motion has been served upon all counsel of record via the Court's ECF/CMF system, which will send notice of filing to all counsel of record.

/s/ Stephen J. Haedicke